W1630450001

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397
BRUCE RAUNER, GOVERNOR ALEC MESSINA, DIRECTOR

EAST ST. LOUIS - Combined Sewer Overflows (CSOs) Along the Mississippi River
NPDES Permit No. IL0033472
Compliance Evaluation Inspection

JUN 29 2017

Ms. Girthal Clemons, Public Works Director
City of East St. Louis
301 River Park Drive
East St. Louis, Illinois 62201

Dear Ms. Clemons:

In accordance with the provisions of the Illinois Environmental Protection Act, an inspection of the City of East St. Louis CSO Facilities was conducted on September 27, 2016 and October 25, 2016 by Fred Rosenblum, DWPC/FOS of the Collinsville Regional Office representing this Agency. Mr. Rosenblum was accompanied on September 27, 2016 by Wayne Caughman, DWPC/FOS of the Collinsville Regional Office representing this Agency. During this inspection, Girthal Clemons and Sam Swanson of the City of East St. Louis, as well as James Roth and Terry Sudholt of Hurst-Rosche, Inc. were present, and we would like to thank them for their assistance.

The purpose of this inspection is to inform you of the results of this inspection. Based on the results of this inspection and a review of our records concerning your facilities, the City has been working on compliance with the nine (9) minimum controls contained in the National CSO Control Policy. This Agency received a Report prepared by Hurst-Rosche Engineers, Inc. for the City of East St. Louis dated May 5, 2000 containing the following information required by the NPDES Permit: a CSO Operation and Maintenance (O & M) Plan; Report on Sensitive Area Considerations; a Draft Revision to the City's Sewer User Ordinance; and a Monitoring, Reporting and Notification Requirement Report. However, the following recommendations are made to help the City facilitate compliance with their NPDES Permit and improve the overall operation/maintenance of these facilities:

1. The City of East St. Louis shall prepare and submit to this Agency a Long-Term Control Plan (LTCP) for approval as required by Special Condition 7 of the NPDES Permit. Also, submit to this Agency quarterly reports on the development of the LTCP. Upon completion and submittal of this plan, the City shall implement their LTCP in accordance with their NPDES Permit.

2. Submit monthly Discharge Monitoring Report (DMR) forms to this Agency as required by Special Condition 4 of the NPDES Permit. These monthly reports have not been received by this Agency.

3. Take steps to comply with the Monitoring, Reporting and Notification Requirements Outlined in Items 11-13, Special Condition 7 of the NPDES Permit. This includes monitoring the frequency of discharge and estimating the duration in hours of each discharge from each Outfall. Estimates of storm duration and total rainfall shall be provided in these reports. The City is required to develop a public notification program as outlined in their NPDES Permit. The NPDES Permit requires the City to submit the public information meeting documentation to the IEPA and implement the public notification program by October 22, 2014.

4. Submit to this Agency a Report on Control (or justification of no control) of CSOs to Sensitive Areas. The Agency has not yet received this Report. The NPDES Permit requires it to be submitted to the Agency by October 22, 2014.

5. The City shall prepare and submit to this Agency a Certification of Sewer Use Ordinance Review. The NPDES Permit states that this Certification shall be submitted to the Agency by October 22, 2014. The Agency has not yet received this Certification.

6. Submit to this Agency a Pollution Prevention Plan (PPP) Certification, Operation and Maintenance Plan (OMP) Certification, and Public Notice information meeting summary. These items, which were required to be submitted by October 22, 2014 in accordance with the NPDES Permit, have not yet been received by this Agency.

7. Determine the sources of inflow and infiltration (I/I) in the sewer system and make the necessary repairs. Heavy rains have resulted in reported CSO events and basement backups.

The Agency requests a written response with 45 days of this letter that details the actions taken or planned to address these issues. Please send this response to the Illinois EPA, 2009 Mall Street, Collinsville, Illinois 62234.

A copy of the inspection report is enclosed for your information. If you should have any further questions or comments concerning this letter or if this Agency can be of any assistance, feel free to contact Fred Rosenblum at 618/346-5120.

Sincerely,

ENVIRONMENTAL PROTECTION AGENCY

James L. Miles
Acting Manager, Field Operations Section
Division of Water Pollution Control
Bureau of Water

Enclosures

cc: James Roth

bcc: BOW/DWPC/FOS – Collinsville
bcc: BOW/DWPC/FOS/RU
bcc: BOW/DWPC/CAS

EPA

United States Environmental Protection Agency

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2	3 I L 0 0 3 3 4 7 2 11	12 1 6 0 9 2 7 17	18 C	19 S 1	20 1

Remarks

21 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 69	70 3	71 N	72 N	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time/Date	Permit Effective Date
City of East St. Louis Combined Sewer Overflows (CSOs) along the Mississippi River **East St. Louis, IL 62201**	**9:15 AM, 9/27/2016** **10:00 AM, 10/25/2016**	**10/22/2013**
	Exit Time/Date	**Permit Expiration Date**
	11:30 AM, 9/27/2016 **11:30 AM, 10/25/2016**	**9/30/2018**

Name(s) of On-Site Representative(s)/Title(s)/ Phone and Fax Number(s)	Other Facility Data
Sam Swanson, Street Superintendent **618/641-1765** **Girthal Clemons, Public Works Director 618/979-7895**	

Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted
Girthal Clemons, Public Works Director **City of East St. Louis; 301 River Park Drive** **East St. Louis, IL 62201 618/979-7895**	☐ Yes ☒ No

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

M	Permit	S	Flow Measurement	M	Operation & Maintenance	NA	Storm Water
M	Records/Reports	S	Self-Monitoring Program	NA	Sludge Handling/Disposal	M	Combined Sewer Overflow
NA	Facility Site Review	M	Compliance Schedules	NA	Pretreatment	S	Sanitary Sewer Overflow
S	Effluent/Receiving Waters	NA	Laboratory	NA	Pollution Prevention	NA	MS4

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation Codes, as necessary)

See attached Field Report and data sheets for the Compliance Evaluation Inspection that was conducted on September 27, 2016 and October 25, 2016.

SEV Codes

SEV Description

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Fred Rosenblum Fred Rosenblum	**IEPA / DWPC / FOS-Collinsville** **618/346-5120 618/346-5155**	6/14/2017
Signature of Management Q A Reviewer **James L. Miles** **Manager** James L Miles	**Agency/Office/Phone and Fax Numbers** **IEPA / DWPC / FOS** **217/782-1654**	**Date** 6/14/2017

cc:

Section A: National Data System Coding (*i.e., PCS*)

Column 1: Transaction Code. Use N, C, or D for New, Change, or Delete. All inspections will be new unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type (I=Unpermitted, G=general permit, etc.). *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year month day format (e.g., 041001 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection.

A	Performance Audit	U	(U) Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	[	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	]	Storm Water-Construction-Non-Sampling
E	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Compliance	*	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	(U) Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	(U) Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	(U) Toxics Inspection		
R	Reconnaissance	5	(U) Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	(U) Non-Sampling Inspection with Pretreatment		
		7	(U) Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead* agency in the inspection.

A — State (Contractor)
B — EPA (Contractor)
C — Corps of Engineers
J — Joint EPA/State Inspection—EPA Lead
L — Local Health Department (State)
N — NEIC Inspectors
2 — Other Inspectors, Federal (EPA, Specify in Remarks columns)
3 — Other Inspectors, State (Specify in Remarks columns)
5 — EPA Regional Inspector
S — State Inspector
7 — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0271.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as *follow-up* on quality assurance sample results. Enter N *otherwise*.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate media such as CAA, RCRA, and TSCA.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the *NPDES Compliance Inspection Manual's* and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DITIN) on or after July 1, 2005.

FIELD REPORT

Facility: City of East St. Louis CSO System

NPDES Permit No.: IL0033472

BOW ID No.: W1630450002

Inspection Date: September 27, 2016; October 25, 2016

Inspected By: Fred Rosenblum, BOW/DWPC/FOS – Collinsville

Accompanied By: Wayne Caughman, BOW/DWPC/FOS – Collinsville

Interviewed: Girthal Clemons, Public Works Director, City of East St. Louis
Sam Swanson, Street Superintendent, City of East St. Louis
James Roth, PE, President, Hurst-Rosche, Inc.
Terry Sudholt, PE, Associate, Hurst-Rosche, Inc.

GENERAL INFORMATION:

Facility Ownership: The facilities are owned by the City of East St. Louis. The contact information is 301 River Park Drive, East St. Louis, Illinois 62201. Girthal Clemons is the Public Works Director for the City. Her telephone number is 618/979-7895.

Facility Type: The City of East St. Louis owns and operates a combined sanitary sewage and storm water collection system with three (3) known overflow points within East St. Louis. Under normal dry weather conditions, sewer flows from these facilities are pumped to the East St. Louis Pump Station, which sends the flows to the American Bottoms Regional Wastewater Treatment Plant (WWTP) in Sauget. It should be noted the East St. Louis Pump Station and American Bottoms Regional WWTP are owned/operated by the Village of Sauget. Excess flow during large storm events is discharged to the receiving stream specified in the NPDES Permit. These by-pass discharges only occur during large precipitation events and all wastewater is combined with storm water runoff.

Facility Location: The combined sewer overflow (CSO) discharges are located along the Mississippi River in East St. Louis, Illinois. The latitude/longitude for the CSO discharges at Outfalls 001/002 is 38°36'36" North and 90°10'55" West. The latitude/longitude for the CSO discharge at Outfall 003 is 38°36'19" North and 90°06'23" West.

Facility Discharges: The NPDES Permit regulates the following discharges from combined sewer overflows: Outfall 001 - American Bottoms Pump Station Bypass CSO; Outfall 002 - 14th and Gay Avenue CSO; and Outfall 003 - 47th and Lake Drive CSO.

Receiving Waters: Mississippi River at Outfalls 001 and 002; and Frank Holten State Park Lake at Outfall 003. Frank Holten State Park Lake is tributary to the Mississippi River.

Service Population: Based on the most recent U.S. census data, the total population served is 27,000.

Background: The City of East St. Louis owned and operated an activated sludge sewage treatment plant (STP) in the 1980s and early 1990s. After the American Bottoms Regional Wastewater Treatment Plant (WWTP) in Sauget was constructed and commenced operation in the early 1990s, the East St. Louis STP was taken out-of-service and mothballed. Upon elimination of their WWTP, the City of East St. Louis was operating a combined sanitary sewage and storm water collection system within the City limits.

The City of East St. Louis since then has operated a system in which sewer flows from these facilities under normal dry weather conditions are pumped to the East St. Louis Pump Station, which sends the flows to the American Bottoms Regional Wastewater Treatment Plant (WWTP) in Sauget. This included two (2) known overflow points within East St. Louis, with overflows occurring because of heavy storm water events. These overflows are CSO Outfalls 001 and 002.

Construction Permit No. 1993-IB-4242 was issued for the Lift Station Rehabilitation Phase I project. This involved rehabilitation of three (3) sanitary sewer pump stations, including replacement of existing pumps, motors, generators, etc. Construction Permit Nos. 1995-IB-5645 and 1995-IB-5645-1 were later issued under a loan project (C17-3057) to renew and replace the previously issued construction permit for the Phase I Lift Station Rehabilitation project. This loan project also involved rehabilitation of three (3) sanitary sewer pump stations. This included replacing some of the pumps, motors, piping and generators. The previously referenced supplemental permit involved additional force main construction. These include the Oak Park Pump Stations. During periods of high flow due to heavy rains, the overflow flow from the Oak Park Pump Station #1 tops the weir, resulting in a combined sewer overflow (CSO) discharge at Outfall 003.

Facility Description: The facilities for CSO 1 and CSO 2 are located along the Mississippi River. The overflow structure located at the American Bottoms Pump East St. Louis Station receives a combination of flow from two (2) different box sewers and diverts the flow to that pump station under normal conditions; during periods of high flow due to heavy rains, the flow tops the weir and discharges to the Mississippi River at Outfall 001. The overflow structure at the intersection of 14th and Gay Avenue receives flow from a box sewer and diverts it to another box sewer that is tributary to the American Bottoms East St. Louis Pumps Station; during periods of high flow due to heavy rains, the flow tops the weir and discharges to the Mississippi River at Outfall 002.

The facilities for CSO 3 are located near Frank Holten State Park. The Oak Park #1 Lift Station is located along 47th Street, just North of State Street. Under normal conditions, this pump station sends flows to the American Bottoms Pump East St. Louis Station. During periods of high flow due to heavy rains, the flow tops the weir and discharges to a collection manhole that is adjacent to the high school, prior to entering the Frank Holten State Park Lake (Outfall 003).

COLLECTION SYSTEM:

Area Served: The system serves the City of East St. Louis.

Type of System: It is estimated that 2/3 of the system consists of combined sewers and 1/3 of the system consists of separate sanitary sewers.

System Problems: Inflow and infiltration (I/I) problems occur within the system due to heavy rain conditions. Basement backups have been reported in the past. Combined sewer overflow (CSO) events occur because of periods of high flow due to heavy rains.

The NPDES Permit authorizes discharges from combined sewer overflow(s)/bypass(es) at Outfalls 001, 002 and 003, provided that the diversion structure is located on a combined sewer and that all terms of the Authorization of Combined Sewer and Treatment Plant Discharges outlined in the NPDES Permit are met.

The NPDES Permit, which was reissued/effective on October 22, 2013, requires that the Permittee develop a CSO Long-Term Control Plan (LTCP) to assure that discharges from the permitted CSOs (treated or untreated) authorized under the NPDES Permit do not cause or contribute to violations of applicable water quality standards or cause use impairment in the receiving waters. This Plan requires that discharges from the CSOs comply with all the requirements specified in the NPDES Permit. At the time of the Agency inspection, a LTCP had not yet been developed or submitted. The reissued NPDES Permit requires the City to submit the CSO LTCP to this Agency by October 22, 2014.

The IEPA received a CSO Operational and Maintenance (O & M) Plan for the sewer system on May 9, 2000. This Plan was part of the report dated May 5, 2000 that was prepared for the City of East St. Louis by Hurst-Rosche Engineers. In compliance with requirements of the NPDES Permit, this report also contains the following items: a Report on Sensitive Area Considerations; establishment of the nine (9) minimum controls; a Draft Revision to Sewer User Ordinance; and a report with a specification of the Monitoring, Reporting and Notification Requirements.

East St. Louis has a routine maintenance program that focuses on preventative maintenance. City personnel periodically check for leaks in the sewer system. The system is inspected on Monday through Friday of each week, and an inspection report is produced from the daily inspection forms. The City provides cleaning of sewers, manholes and catch basins with operating personnel and equipment. A vactor truck is utilized to remove sediment from structures daily. These structures are cleaned when necessary, and the results are recorded on street maintenance cleaning report forms. Overflow structures are observed on a weekly basis (daily during storm events) to assure there are no obstructions to flow. Any problems are recorded on maintenance report forms.

The O & M personnel routinely inspect the critical elements of the system to determine if there has been an overflow, if the system is operating correctly, and if any repairs are needed. During periods of dry weather, City personnel inspect interceptors and combined sewers for blockages, excessive solids, I/I and structural deterioration, etc. The inspection forms are completed and review, and repairs are made if necessary.

Collection System Lift Stations: There currently are 17 lift stations on the collection system. These are operated and maintained by the City of East St. Louis. These lift stations are visited by City personnel on a daily basis Monday through Friday. These stations are generally not visited on weekends, unless necessary. For example, if a CSO occurs at the previously referenced Outfalls during a weekend, the associated lift stations would be visited and any necessary maintenance would be performed. An automatic dialer is provided at some of the pump stations to notify the proper operating personnel when a problem exists so that the necessary repairs can be made. The City has a contractual agreement with Vandevanter Engineering to do semi-annual preventative maintenance on these facilities. An updated copy of this agreement was presented to this Agency during the inspection.

Industrial Users: There are no industrial users on the system. All the incoming waste is domestic waste.

CSO SYSTEM EVALUATION:

Facilities Associated with CSO 1 and CSO 2: These facilities are associated with the American Bottoms Pump Station Bypass (CSO 1) and 14th and Gay Avenue Combined Sewer Overflow (CSO 2). The 12.5' diameter box sewer runs from the American Bottoms (AB) Regional WWTF East St. Louis Pump Station along Liberty Street, 13th Street, Illinois Avenue, and 20th Street to Ohio Avenue. This box sewer ranges in size from 12.5' by 12.5' to 11.0' by 11.5'. The 10.5' diameter box sewer runs from the intersection with the 12.5' box sewer to 29th Street. It should be noted that the box sewers are constructed of reinforced concrete.

The American Bottoms East St. Louis Pump Station is located at the site of the abandoned City of East St. Louis STP. This pump station receives flow from the East St. Louis collection system and pumps this wastewater to the American Bottoms WWTP. It has been noted that this pump station impacts the amount and duration of CSO discharges from the City of East St. Louis.

The Metro East Sanitary District (MESD) Pump Station is located just east of the levee and the East St. Louis CSO Outfalls 001 and 002. These facilities are now owned and operated by the MESD. During periods when the Mississippi River is at lower stages, the emergency sluice gates are opened, allowing the gravity flow of CSO discharges to both Outfalls. During periods when the Mississippi River is at higher stages, the emergency sluice gates are closed to prevent River water from flowing back into the East St. Louis collection system, and the pump station is activated to pump the CSO discharges to the River.

The Overflow structure at the American Bottoms (AB) East St. Louis Pump Station receives a combination of flow from the 12.5' box sewer and 10.5' box sewer, and diverts flow to that pump station under normal dry weather conditions. During periods of high flow caused by heavy rains, the flow tops the weir and discharges to the Mississippi River at Outfall 001. This CSO outfall is located on the bank of the Mississippi River just west of the MESD Pump Station and north of CSO Outfall 002. Outfall 001 receives CSO discharges from the 12.5' box sewer during periods when the flow through the sewer exceeds the capacity of the AB East St. Louis Pump Station.

The Overflow structure at the intersection of 14th Street and Gay Avenue receives flow from the 10.5' box sewer and diverts it to the 12.5' box sewer under normal dry weather conditions. During periods of high flow due to heavy rains, the flow tops the weir and discharges to the Mississippi River at Outfall 002. This CSO outfall is located on the bank of the Mississippi River just west of the MESD Pump Station and south of CSO Outfall 001. Outfall 002 receives CSO discharges from the10.5' sewer when the flow through the sewer exceeds the capacity of the interconnection with the 12.5' sewer.

During the visit on October 25, 2016, the inspector observed the AB East St. Louis Pump Station and the influent structure that receives wastewater from East St. Louis and other communities. This influent structure is in an underground concrete structure next to the East St. Louis Pump Station. At the time of the inspection, wastewater entering this structure was typical dry weather flow. No CSO discharges were occurring at the time of the inspection. The box sewers diverting the flows are located underground and could not be observed during the inspection. It was noted that the American Bottoms Bypass travels west, and can go past the MESD diversion gates to the River. When the bypass enters the MESD Pump Station, it is pumped to the River at via Outfall 001. The MESD Pump Station was not observed. Also, the CSO 1 and CSO 2 overflow points were not observed during the inspection due to lack of access.

Facilities Associated with CSO 3: These facilities are associated with the Combined Sewer Overflow on 47th and Lake Drive (CSO 3). The inspector visited these facilities on September 27, 2016.

The Oak Park #1 Pump Station is located along 47th Street, just north of State Street. The Senior High School is to the east of this pump station. Wastewater enters this station via a 36-inch interceptor. A masonry building houses the pumps, controls, security system, and other equipment. Three (3) Fairbanks Morse submersible pumps, each rated at 3000 gpm @ 27' TDH are provided to pump the wastewater to the American Bottoms Regional WWTP via the East St. Louis Lift Station. Each pump is powered by a 30 horsepower (HP) motor. These pumps are in a below grade dry well in the building. The three (3) pumps alternate, with one in the lead and one in lag. A Missouri Machinery electrical panel contains the pump controls. One of the pumps is used as standby. A remote readout device is provided in the building to read the flow rate. At the time of the inspection, the device indicated a reading of 418 gallons per minute (gpm) to the American Bottoms WWTF.

A Cummins Onan generator rated at 100 KVA in 3 phase operation is mounted outside the masonry building and is enclosed in a chain link fence. The access gate was locked. Fuel is supplied from a 180-gallon double walled steel tank mounted under the generator support frame. The generator was reportedly operating properly.

The pumps discharge to the existing 18-inch header via 12-inch lines. Each line is provided with a gate valve and check valve. The pumped flow is metered using a Badger sonic meter attached to the 18-inch force main in the meter vault on the west side of the building. A totalizer is mounted inside the building.

Under normal conditions, the pumps discharge the wastewater to the American Bottoms East St. Louis Pump Station. During periods of high flow caused by heavy rains, the flow tops the weir and discharges to the Frank Holten State Park Lake at Outfall 003. No CSO was occurring at the time of the inspection. The overflow structure was observed at an underground manhole on 47th Street and Lake Drive near the High School. There was a small amount of standing water in the manhole. When a CSO discharge at Outfall 003 occurs, the overflow travels to the previously referenced Lake via three (3) 72" diameter pipes. No water was coming out of these pipes. Visual examination of the Lake indicated no noticeable impairment from the facility's past CSO discharges.

NPDES PERMIT COMPLIANCE:

Authorization of Combined Sewer and Treatment Plant Discharges: The IEPA has determined that at least a portion of the collection system consists of combined sewers. Special Condition 7 of the NPDES Permit authorizes discharges from the combined sewer overflows/bypasses listed below provided the diversion structure is located on a combined sewer and all terms of that Special Condition are met:

Discharge No.	Location	Receiving Water(s)
001	American Bottoms Pump Station Bypass	Mississippi River
002	14th and Gay Avenue CSO	Mississippi River
003	47th and Lake Drive CSO	Frank Holten State Park Lake

The IEPA received a report dated May 5, 2000 that was prepared for the City of East St. Louis by Hurst-Rosche Engineers. In Compliance with the previously referenced Authorization, this report contains the following Items: a CSO O & M Plan for the sewer system; a Report on Sensitive Area Considerations; establishment of the nine (9) minimum controls; a Draft Revision to Sewer User Ordinance; and a report with a specification of the Monitoring, Reporting and Notification Requirements.

The City has been working on implementation of the 9 minimum controls contained in the National CSO Control Policy published in the Federal Register on April 19, 1994. These are specified in Special Condition 7 of the NPDES Permit.

Based on a review of the City's Report on Sensitive Area Considerations, the IEPA has determined that the discharges from Outfalls 001 and 002 are not to sensitive area(s), but that Outfall 003 discharges to sensitive area(s). The NPDES Permit requires the Permittee to submit to the Agency two (2) copies of a schedule to relocate, control, or treat discharges from Outfall 003 as specified. This schedules has not been received by the Agency.

Item 14 of Special Condition 7 contains a summary of compliance dates that specified submittals are due. A Certification of Sewer User Ordinance Review, Pollution Prevention Plan (PPP) Certification, OMP Certification, and Public Notice (PN) Information Summary were all due in 2014 but have not yet been received by this Agency.

Long-Term Control Plan (LTCP): The previously referenced Authorization of Combined Sewer and Treatment Plant Discharges outlined in Special Condition 7 of the NPDES Permit requires that the Permittee develop a CSO Long-Term Control Plan (LTCP) to assure that discharges from the permitted CSOs (treated or untreated) authorized under the NPDES Permit do not cause or contribute to violations of applicable water quality standards or cause use impairment in the receiving waters. This requires implementation of the LTCP such that discharges from the CSOs comply with all the requirements specified in the NPDES Permit. The Reissued NPDES Permit requires the City to submit the CSO LTCP to this Agency by October 22, 2014. A LTCP has not yet been developed or submitted. The previously referenced compliance schedule also requires progress reports on the development of the LTCP. A violation notice (VN W-2014-50074) was issued on May 2, 2014 was issued to the City citing them for failure to develop and submit a LTCP, and failure to submit the other specified items in the previously referenced Authorization.

Records and Reports: The monthly Discharge Monitoring Reports (DMRs) required by the NPDES Permit have not been received.

Monitoring and Sample Collection: The Authorization of CSO Discharges in Special Condition 7 of the NPDES Permit contains the Monitoring, Reporting and Notification Requirements Outlined in Items 11-13 of that Special Condition. The Permittee is required to monitor the frequency of discharge (number of discharges per month) and estimate the duration (in hours) of each discharge from each outfall. Estimates of storm duration and total rainfall are required to be provided for each storm event. Monitoring and public notification requirements are outlined in this Special Condition.

Effluent Quality: Unknown because the required monitoring reports are not being submitted.

SUMMARY:

The City has been working on compliance with the nine (9) minimum controls contained in the National CSO Control Policy. As noted earlier in this report, the Agency received a report dated May 5, 2000 that was prepared for the City of East St. Louis by Hurst-Rosche Engineers containing a CSO O&M Plan for the sewer system, a Report on Sensitive Area Considerations, a Draft Revision to their Sewer User Ordinance, and a Report with specification of the Monitoring, Reporting and Notification Requirements. However, the City has not prepared and submitted a LTCP to this Agency. Also, there are additional items required by the previously referenced CSO Authorization that have not yet been received by this Agency.

Recommendations:

The following recommendations are made concerning the City's combined sewer system to comply with the NPDES Permit and improve maintenance/operation of the system:

1. The City of East St. Louis shall take action to prepare and submit to this a Long-Term Control Plan (LTCP) to this Agency for approval as required by Special Condition 7 of the NPDES Permit. This Special Condition also requires the submittal of progress reports on the development of the LTCP on a quarterly basis. The City shall implement their LTCP as specified in the NPDES Permit.

2. The City is required to submit monthly Discharge Monitoring Report (DMR) Forms to this Agency as required by Special Condition 4 of the NPDES Permit. These monthly reports have not been received.

3. The City shall take steps to comply with the Monitoring, Reporting and Notification Requirements specified in Items 11-13 of Special Condition 7. This includes monitoring the frequency of discharge and estimate the duration in hours of each discharge from each outfall. These reports shall provide estimates of storm duration and total rainfall. The City shall also develop a public notification program as specified in this Permit. The NPDES Permit also requires the City to submit the public information meeting documentation to the IEPA and implement the public notification program by October 22, 2014.

4. The compliance schedule in Special Condition 7 requires the Permittee to submit to this Agency a Report on Control (or Justification of No Control) of CSOs to Sensitive Areas by October 22, 2014. The indicated Report has not yet been submitted to this Agency.

5. A Certification of Sewer Use Ordinance Review shall be prepared and submitted to this Agency. The previously indicated compliance schedule states that this Certification was due on April 22, 2014.

6. The City shall submit a Pollution Prevention Plan (PPP) Certification, Operation and Maintenance Plan (OMP) Certification, and Public Notice (PN) information meeting summary to this Agency. The compliance schedule in Special Condition 7 requires these Certifications to be submitted by October 22, 2014.

7. Inflow and infiltration (I/I) in the system occurs because of heavy rains. This has resulted in CSO events. Also, basement backups have been reported in the past. The City needs to determine the sources of I/I in the sewer system and make the necessary repairs.

Fred Rosenblum

Attachments

cc: BOW/DWPC - Collinsvile
cc: BOW/DWPC/RU
cc: BOW/DWPC/CAS
cc: City of East St. Louis
cc: Hurst-Rosche, Inc.

DRAFT

This draft Permit also contains the following requirements as special conditions:

1. Reopening of this Permit to include different final effluent limitations.

2. Submission of the operational data in a specified form and at a required frequency at any time during the effective term of this Permit.

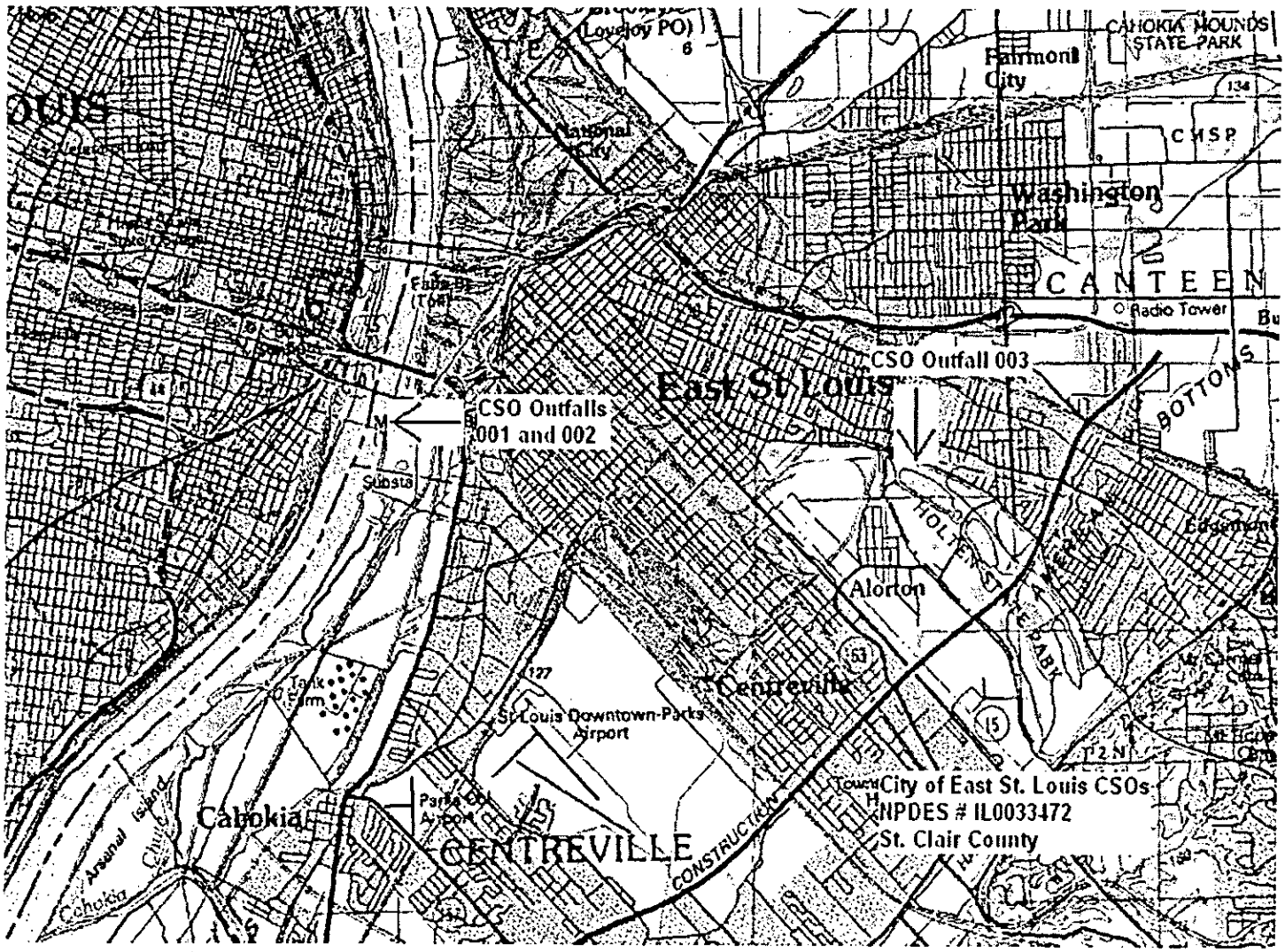
3. Prohibition against causing or contributing to violations of water quality standards.

4. Recording the monitoring results on Discharge Monitoring Report Forms using one such form for each outfall each month and submitting the forms to IEPA each month.

5. The provisions of 40 CFR Section 122.41(m) & (n) are incorporated herein by reference.

6. Reopening of this Permit to include revised effluent limitations based on a Total Maximum Daily Load (TMDL) or other water quality study.

7. An authorization of combined sewer discharges.



EXHIBIT

A

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Belleville, Illinois 62220
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618.233.5977 *fax*
www.kaskaskiaeng.com

PROFESSIONAL REGISTRATIONS	LICENSE NO.
Illinois Professional Design Firm	184.004773
Professional Engineering Group	20-5080586

LOCATION MAP

EAST ST. LOUIS
N.P.D.E.S. APPLICATION
EAST ST. LOUIS, ILLINOIS

OPERATOR: TJR
LAST PLOTTED: 9/11/2012 1:54 PM
FILE: P:\12-1036.03 ESTL NPDES\CAD EXHIBITS\12-1036.03 ESTL NPDES - EXHIBITS.dwg